

Hand-Delivered

## UNITED STATES DISTRICT COURT

for the

Western District of North Carolina

\_\_\_\_ Division

MACKENZIE ELAINE BROWN

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

(SEE ATTACHED)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Case No.

1:23-CV-270-MR-WCM

(to be filled in by the Clerk's Office)

Jury Trial: (check one)



Yes



No

FILED  
ASHEVILLE, NC

SEP 14 2023

U.S. DISTRICT COURT  
W. DISTRICT OF N.C.

## COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Non-Prisoner Complaint)

## NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

*[Continuation of Page 1 of COMPLAINT FOR VIOLATION OF CIVIL RIGHTS form]*

**DEFENDANTS:**

Henderson County Sheriff's Office

Robert Jordan Warren

Michael Scott Lindsay

Crystal D. Landers

Johnny E. Duncan Jr.

Bradley R. Reese

Brittany Nicole Maybin

Susan N. Oates

Emily Greene Cowan

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name Mackenzie Elaine Brown  
 Address 158 Haven Rd  
East Flat Rock NC 28726  
City State Zip Code  
 County Henderson  
 Telephone Number 828-642-0406  
 E-Mail Address mackenzieb0897@gmail.com

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

## Defendant No. 1

Name Henderson County Sheriff's Office  
 Job or Title (if known) Law Enforcement Agency  
 Address 100 N Grove St  
Hendersonville NC 28792  
City State Zip Code  
 County Henderson  
 Telephone Number 828-697-4596  
 E-Mail Address (if known) \_\_\_\_\_

☐ Individual capacity ☒ Official capacity

## Defendant No. 2

Name Robert Jordan Warren  
 Job or Title (if known) Sheriff Deputy  
 Address \_\_\_\_\_  
 \_\_\_\_\_  
City State Zip Code  
 County \_\_\_\_\_  
 Telephone Number 828-697-4596  
 E-Mail Address (if known) jwarren@hendersoncountync.gov

☒ Individual capacity ☒ Official capacity

## Defendant No. 3

Name

Michael Scott Lindsay

Job or Title (if known)

Sheriff Deputy

Address

City

State

Zip Code

County

Telephone Number

828-697-4596

E-Mail Address (if known)

mlindsay@hendersoncountync.gov

☒ Individual capacity ☒ Official capacity

## Defendant No. 4

Name

Crystal D. Landers

Job or Title (if known)

Sheriff Deputy

Address

City

State

Zip Code

County

Telephone Number

828-694-3105

E-Mail Address (if known)

clcapps@hendersoncountync.gov

☒ Individual capacity ☒ Official capacity

## II. Basis for Jurisdiction

All 9 Defendants listed on the following page.

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

The Crime Victims' Rights Act (CRVA) 18 U.S.C. Section 3771  
& the 1st, 4th, and 14th Amendments to the Constitution of the U.S.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

**DEFENDANT 1:**

Henderson County Sheriff's Office  
828-697-4596  
100 N Grove St, Hendersonville, NC 28792  
Job Title: Law Enforcement Agency

**DEFENDANT 2:**

Robert Jordan Warren  
828-697-4596  
jwarren@hendersoncountync.gov  
Job Title: Sheriff Deputy with Henderson County Sheriff's Office - Patrol Division

**DEFENDANT 3:**

Michael Scott Lindsay  
828-697-4596  
mlindsay@hendersoncountync.gov  
Job Title: Sheriff Deputy with Henderson County Sheriff's Office - Patrol Division

**DEFENDANT 4:**

Crystal D. Landers  
828-694-3105  
clcapps@hendersoncountync.gov  
Job Title: Sheriff Deputy with Henderson County Sheriff's Office - Patrol Division

**DEFENDANT 5:**

Johnny E. Duncan Jr.  
828-694-2785  
828-697-4596 ext. 4305  
jduncan@hendersoncountync.gov  
Job Title: Henderson County Director of Technical Services / Public Information Officer with Henderson County Sheriff's Office

**DEFENDANT 6:**

Bradley R. Reese  
828-694-2785  
breece@hendersoncountync.gov  
Job Title: Animal Enforcement Officer with Henderson County Sheriff's Department

**DEFENDANT 7:**

Brittany Nicole Maybin  
828-694-3105  
bmaybin@hendersoncountync.gov  
Job Title: Detention Facility Officer with Henderson County Detention Facility

**DEFENDANT 8:**

Susan N. Oates

828-694-4150

Job Title: Magistrate with North Carolina Administrative Office of the Courts

**DEFENDANT 9:**

Emily Greene Cowan

828-694-4225

Job Title: District Court Judge with the North Carolina Consolidated Judicial Retirement System

Defendant Henderson County Sheriff's Office is a law enforcement agency located within Henderson County, North Carolina. It acted in concert with the other defendants in the wrongdoing against Plaintiff. It is sued in its official capacity.

Defendant Robert Jordan Warren is and was at all times mentioned herein, a sheriff deputy with Henderson County Sheriff's Office. He is sued both in his individual and official capacity.

Defendant Michael Scott Lindsay is and was at all times mentioned herein, a sheriff deputy with Henderson County Sheriff's Office. He is sued both in his individual and official capacity.

Defendant Crystal D. Landers is and was at all times mentioned herein, a sheriff deputy with Henderson County Sheriff's Office. She is sued both in her individual and official capacity.

Defendant Johnny E. Duncan Jr. is and was at all times mentioned herein, a Public Information Officer with Henderson County Sheriff's Office. He is sued both in his individual and official capacity.

Defendant Bradley R. Reese is and was at all times mentioned herein, an Animal Enforcement Officer with Henderson County Sheriff's Office. He is sued both in his individual and official capacity.

Defendant Brittany Nicole Maybin is and was at all times mentioned herein, a Detention Facility Officer with Henderson County Detention Facility. She is sued both in her individual and official capacity.

Defendant Susan N. Oates is and was at all times mentioned herein, a Magistrate with Henderson County Magistrate's Office. She is sued both in her individual and official capacity.

Defendant Emily Greene Cowan was a District Court Judge within the North Carolina Judicial System. She is sued both in her individual and official capacity.

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

(see attached)

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Events occurred at the Sheriff's Office, Magistrate's Office, Detention Facility, and Courthouse in Henderson County, NC. Also at the driveway of my residence in East Flat Rock

- B. What date and approximate time did the events giving rise to your claim(s) occur?

Beginning on October 1, 2021

- C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

(see attached)

[Continuation of Page 4 of COMPLAINT FOR VIOLATION OF CIVIL RIGHTS form - under Basis for Jurisdiction, Question D]

Defendant WARREN, under color of law by acting in the performance of his official duties as a Patrol Officer under Henderson County Sheriff's Office, willfully subjected Plaintiff Brown to the deprivation of her rights, privileges, or immunities secured or protected by the Constitution or laws of the United States.

Defendant LINDSAY, under color of law by acting in the performance of his official duties as a Patrol Officer under Henderson County Sheriff's Office, willfully subjected Plaintiff Brown to the deprivation of her rights, privileges, or immunities secured or protected by the Constitution or laws of the United States.

Defendant LANDERS, under color of law by acting in the performance of her official duties as a Patrol Officer under Henderson County Sheriff's Office, willfully subjected Plaintiff Brown to the deprivation of her rights, privileges, or immunities secured or protected by the Constitution or laws of the United States.

Defendant DUNCAN, under color of law by acting in the performance of his official duties as a Public Information Officer under Henderson County Sheriff's Office, willfully subjected Plaintiff Brown to the deprivation of her rights, privileges, or immunities secured or protected by the Constitution or laws of the United States.

Defendant REESE, under color of law by acting in the performance of his official duties as an Animal Enforcement Officer under Henderson County Sheriff's Office, willfully subjected Plaintiff Brown to the deprivation of her rights, privileges, or immunities secured or protected by the Constitution or laws of the United States.

Defendant MAYBIN, under color of state law by acting in the performance of her official duties as a Detention Facility Office under Henderson County Detention Facility, willfully subjected Plaintiff Brown to the deprivation of her rights, privileges, or immunities secured or protected by the Constitution or laws of the United States.

Defendant OATES, under color of law by acting in the performance of her official duties as a Magistrate under Henderson County Magistrate's Office, willfully subjected Plaintiff Brown to the deprivation of her rights, privileges, or immunities secured or protected by the Constitution or laws of the United States.

Defendant COWAN, under color of law by acting in the performance of her official duties as a District Court Judge under the North Carolina Judicial System in the Henderson County Courthouse, willfully subjected Plaintiff Brown to the deprivation of her rights, privileges, or immunities secured or protected by the Constitution or laws of the United States.



*[Continuation of Page 4 of COMPLAINT FOR VIOLATION OF CIVIL RIGHTS form - under Statement of Claim, Question C]*

**FACTS:**

On October 1, 2021 around 12 PM, I showed up to Henderson County Magistrate's Office / Sheriff Department to file charges for assault against Dillion Branch. The assault incident happened 4 days prior, on September 26, 2021. At this time, I was 16 weeks pregnant with his child.

There were 2 people in my vehicle other than me; Dan Pearson and Jennifer Seidman. Prior to arrival, they asked me if they could ride along because Dan needed to go to the Sheriff's Office anyway to inquire about his missing truck.

Once parked in the Sheriff's Office parking lot, I observed a pink sheriff cruiser parked on display. Upon first glance, I noticed at least 5 black Sharpie markers laid out on the trunk of the vehicle. I noticed several indications of signage already made with the Sharpie markers on various parts of the car. I did not closely inspect what any of the signage actually said.

I was unclear about what the purpose of the pink cruiser was for. I just simply did not think that far into it. My perspective was very indifferent and mindless towards the vehicle at that point in time.

The background story of this is that Henderson County Sheriff's Office (HCSO) were willingly giving the public an open invitation for signage on the pink car as part of their event, even providing the sharpies to write on it with.

Other than those observations, I paid the pink vehicle no mind, and continued about what I was there to do. I walked past the Sheriff's Office to the Magistrates Office while Dan and Jennifer stayed at the front of the Sheriff's Office to handle their business.

Once inside the Magistrates Office, I filled out a criminal complaint form against Dillion with the Magistrate on duty, Defendant OATES.

On the form, under "WHAT DID SUSPECT DO?" I wrote, "Assaulted me while I'm pregnant by strangling my throat, squeezing my torso to keep me restrained, said he wanted to kill me and my baby, said he would burn house with me in it, came towards me with my ax but I drove off before he could hurt me anymore. He stole the ax (worth \$80)."

After I finished filling out the form, I took a picture of the completed criminal complaint form with my phone. The overall process seemed to go accordingly and successfully.

Once I exited the Magistrates Office and proceeded to walk back to my vehicle, I noticed Dan was still speaking to a deputy, Defendant WARREN, in front of the Sheriff's Office, so I joined Jennifer where she was standing in front of the pink vehicle.

Jennifer was doodling illustrations on the upper midsection of the pink cruiser with one of the Sharpies that were laid out. She held out a Sharpie to me and encouraged me to draw too while we were waiting on Dan to finish his conversation with Defendant WARREN.

It was then that I realized the conversation between Dan and Defendant WARREN had actually turned into more of an argument than a discussion. Both of them were raising their voices at each other and both had flushed faces and angered expressions.

I turned my attention back to the pink car, then I accepted the Sharpie marker Jennifer was holding out to me. At that moment I briefly observed the vehicle itself and the overall nearby area where the pink car was parked on display. There were not any rules, regulations, directions, instructions, or clues posted in any way indicating what the public could, could not, should, or should not write.

I wrote "12 SUX" on the upper midsection of the vehicle. All 5 characters took up a space no bigger than the palm of my hand. "12" is slang terminology for law enforcement and "SUX" is an abbreviation for the word SUCKS.

By that time, Dan was ready to leave, so he, Jennifer, and I got in my vehicle and then proceeded to drive to my house.

About 1 hour later around 2 PM, I heard a loud knocking on my back door. Immediately after I opened the door to answer it, the same deputy, Defendant WARREN, that had gotten into the argument with Dan, plus a female deputy, Defendant LANDERS, aggressively yanked me out of my doorway.

I remember saying "Take it easy, I am pregnant!" and although they did ease up their grip on my arms a little bit, Defendant LANDERS still forced me into handcuffs behind my back, doing so with an unnecessary amount of physical force.

They even started accusing me of resisting arrest even though I was very calm and submissive to them the entire time.

None of the officers would tell me why I was being handcuffed and they would not explain to me what they were arresting me for, even though I kept repetitively asking them questions such as: "Why am I being handcuffed?" and "Am I being arrested?" and "What laws have I broken?"

They would not allow me to shut or lock my door behind me. I asked them if they would pull it shut themselves if they weren't going to let me do it and they eventually did pull it shut themselves.

I was silent as they escorted me to the front of my house where I saw 4 to 6 sheriff cars in or around my driveway, including the pink vehicle. Not until then did I finally realize why they were there, and even then, I was very confused trying to understand why I was being arrested when I hadn't broken any laws.

I was silent as Defendant WARREN and Defendant LANDERS took pictures of me standing handcuffed in front of the pink sheriff car and then stood there chastising and insulting me for several minutes. They were both calling me things such as "a piece of shit."

Then Defendant LANDERS shut me inside the vehicle and drove me to Henderson County Detention Facility in the back of the pink cruiser.

In regards to any sheriff officers involved other than Defendant WARREN and Defendant LANDERS, during the process of Henderson County Sheriffs' Office arresting me in my driveway, I do remember seeing several other officers standing around, but those officers were basically just

observing Defendant WARREN and Defendant LANDERS the entire time, rather than assisting them with the unlawful arrest.

Upon arrival at Henderson County Detention Facility, Defendant LANDERS, and detention facility officer Defendant MAYBIN, stood there in the sallyport with me for at least 5 minutes chastising me. They told me things such as "You should feel bad about yourself for this."

Defendant LANDERS and Defendant MAYBIN told me, "The entire car part is going to have to be completely replaced because of what you wrote." That is a judgment outside of their professional expertise to make. I later found out that the vehicle was a regular sheriff car that was wrapped in pink film that can be peeled off. AdventHealth is who was responsible for funding the event and who paid for the cruiser to be wrapped, rather than HCSO. It was also revealed later on that the car part was never actually replaced, but instead was covered with vinyl screening in that one area.

Next I was escorted to booking and served with a WARRANT FOR ARREST paper by Defendant OATES, who was the same Magistrate on duty a couple hours earlier when I had come to file charges against Dillion.

It had not been mentioned by any of the officers present during the arrest in my driveway that there was any kind of warrant for my arrest.

I was given a secured bond of \$2000. Defendant OATES told me that the reason my bond amount was so high was because I've had prior FAILURE TO APPEARS before.

I was photographed, fingerprinted, and moved to a solitary cell. The only window was covered up with paper from the outside, so I could not see anything except four white concrete walls around me.

With the telephone on the wall in the jail cell, I called Dan Pearson and he told me that he was in the process of trying to find a bail bondsman for me. He told me that I could count on him to be my co-signer.

Not long after that phone call with Dan, Defendant MAYBIN was doing rounds and she told me that a bondsman was on the way for me.

However, about half an hour later, when she was doing rounds again, Defendant MAYBIN said to me, ""You might have to stay the entire weekend because no bondsman is willing to come get you anymore." My response: "Why not?" Defendant MAYBIN replied: "Because we told them what you wrote and they respect us so they don't want to come get you now." My response: "Are you guys even allowed to do that?" But Defendant MAYBIN didn't respond to me, and then walked away.

There was personal interest being taken by Defendant MAYBIN to intentionally persuade several bond companies to deny my release through their agencies. I witnessed her either answer the phone herself or direct another unknown officer to answer the phone, once Dan Pearson had the bond companies calling the jail to inquire about releasing me, and persuading them to refuse to bond me out.

After several attempts to find a bond agency willing to overlook the Detention Facility's malicious interference with my release, Dan found a bondsman from ACE BOND AGENCY and sent them to the jail for me, which allowed me to post bond for \$200 and be released from custody.

In the meantime, at 5:40 PM, HCSO had made a post on their Facebook page humiliating me in a false light about the incident, defaming my character. The post was typed by Public Information Officer, Defendant DUNCAN.

The post had pictures of me standing handcuffed in front of the pink vehicle, with an embarrassed look on my face.

The post read: "Now hear this !! This morning the Henderson County Sheriff's Office along with AdventHealth unveiled a pink patrol car for Breast Cancer Awareness Month. The intention of this car was to honor and recognize those individuals who have fought or are currently fighting Breast Cancer. Several hours after unveiling this car Mackenzie Elaine Brown 24 years of age from East Flat Rock decided it would be a good idea to show her respect by coming to the Sheriff's Office and vandalizing this tribute car. Mackenzie didn't put too much thought into her actions or she would have known the Law Enforcement Center is under 24/7 video surveillance. Within less than an hour our officers had identified her and obtained a warrant for her arrest. Seeing how Mackenzie is such a supporter of our pink patrol car we decided to allow her to be the first person to ride in the back seat of it and we also gave her a complimentary stay in the ole gray bar hotel. Mackenzie has been charged with Injury to Personal Property and her bond was set at \$2,000.00 secured.  
#PlayStupidGamesWinStupid Prizes #OurSheriffDoesntPlay #NotInHendersonCounty  
#DontDisrespectThoseWhoHaveFoughtBreast Cancer #EnjoyYourVisitBackToJail"

There is an important difference between the contents of my signage, "12 SUX," versus the misled portrayal of disrespect toward breast cancer. Nowhere in the post does it state that HCSO were willingly giving the public the open invitation to sign the vehicle. Nor does the post state what I actually wrote, which had nothing to do with breast cancer, but yet the post claims I vandalized the vehicle in effort to show my disrespect for breast cancer awareness. My intentions were directed towards law enforcement, not breast cancer. They knew that before, during, and after they publicized the incident in a false light. I later discovered while scrolling through relevant news articles that several law enforcement personnel were among the collection of citizens who signed the vehicle too, some of the names being District Attorney Ashley Hornsby Welch, her father Dr. Ty Hornsby, Deputy Barbara Strang, and Deputy Melinda Davidson.

Within one day of my arrest, 20 different online entities scraped the data from HCSO's falsely portrayed Facebook post and republished the story, along with my personal information and arrest details. That totals 21 sources that I know of that link to the incident.

The names of the sources in alphabetical order are: Daily Advent: Opera News, Facebook: Fox Eastern Carolina page, Facebook: Henderson County Sheriff's Office page, Facebook: WLOS ABC 13 page, Fox San Antonio, Henderson County Sheriff's Office App, Mountain Area Information Network, MSN, My40, NC Criminal Law A UNC School of Government Blog, News 4 San Antonio, News Beezer, News Break, Spotonorthcarolina, Twitter: WSAV News 3 page, WCTI12: ABC 12 News, WJBF, WLOS: News 13, WRBL: News 3, WSAV-TV, and WSPA: News 7.

All of the sources that republished HCSO's falsely portrayed post did not have any disclaimer stating that I was presumed innocent until proven guilty. There was a law passed on July 23, 2021, named Assembly Bill No. 1475 (AB-1475), which prohibits law enforcement agencies from posting mugshots on social media channels, such as Facebook. This law is based upon opposition to "unfettered pretrial publicity" that can lead to wrongful convictions by way of biased identification and prejudice among jury pools, and is in opposition to the presumption of innocence.

There were 3 attempts made on my behalf to remove the defamatory statement on HCSO's Facebook page.

On October 1, 2021 around 7 PM, my brother, Ross Brown, requested that the Facebook post about me be removed. He sent me a text message after I was released that said: "I called dispatch and they got an officer to call me. It was a male officer but I don't remember his name. I asked them to reach out to whoever controls the Henderson County social media posts and remove the post. I told him the way the post was written was very controversial for our family. They made it out to be like you were disrespecting breast cancer awareness. Also you were no threat to society. You were not putting people's lives in danger. You did not commit a violent crime. Their social media page should be used to inform the public of threats... not embarrassing people that have been arrested. It was around 7 PM when I had this phone convo to request the post be removed. The officer that talked to me on the phone was nice but said that the social media person was "off work" but then an hour later around 8 PM they posted something else about their breast cancer awareness weekend."

On October 2, 2021 around 1 AM, my friend, Jennifer Seidman, requested that the Facebook post about me be removed in 2 separate emails to 2 separate Public Information Officers, one being Officer Frank Stout and the other being Defendant DUNCAN. She told me she never did get a response back from either of them.

In Jennifer's first email, sent to Officer Johnny Duncan at email [jduncan@hendersoncountync.gov](mailto:jduncan@hendersoncountync.gov) from her email [jennyseidman22@gmail.com](mailto:jennyseidman22@gmail.com), she sent: "Johnny Duncan Support Services/PIO (828) 694-2785 Mr Johnny Duncan, If you have any control over the Hendersonville NC sheriffs department webpages, the most recent news reveals MACKENZIE ELAINE BROWN. Please remove all news and any pictures of MACKENZIE ELAINE BROWN."

In Jennifer's second email, sent to Officer Frank Stout at email [fstout@hendersoncountync.gov](mailto:fstout@hendersoncountync.gov) from her email [jennyseidman22@gmail.com](mailto:jennyseidman22@gmail.com), she sent: "Major Frank Stout Support Services/PIO (828) 694-2750 Please remove the hateful advertisement of my friend, MACKENZIE ELAINE BROWN."

The next morning, on October 2, 2021 around 9 AM, there was a paper taped to my door with a fine of \$550 by Henderson County Sheriff's Department Animal Enforcement Division, who had showed up to my home and did an extremely random and unexpected dangerous dog inspection while I was asleep.

Defendant REESE was the Animal Enforcement Officer responsible for issuing the violation.

A couple of weeks later, I made a phone call to Henderson County Animal Enforcement with my father, Phil Brown, sitting next to me, who had driven to my house to make this phone call with me and advocate for me.

My father and I told Animal Enforcement that I was unable to afford the \$550 fine and we asked if there was any way to have the violation removed. We explained to them that it wasn't the fact that I didn't want to answer the door for them, it was the fact that I genuinely did not hear them knocking to begin with. We explained that my AC unit in my bedroom was turned on high which blocks out any noise outside of my bedroom. They would have been knocking from the door at the complete opposite end of my residence. It was early morning and I was still asleep. I was exhausted from getting home late the night before from having to bond out in regards to the matter at hand. I was home alone. I was 17 weeks pregnant at that time. We told them that a \$550 fine seems like such an



extreme measure to resort to just for someone not answering their door because they are asleep. A "Warning" instead of a "Citation Violation" would have been much more reasonable.

The officer's response was, "We can take away the \$550 charge, but we'll have to mark that as your dog's strike 2, and on strike 3, we'll have to put her down."

On March 24, 2022 during a court appearance on the matter, Defendant COWAN unlawfully denied my request for dismissal, in effort to side with Defendant WARREN and Defendant LINDSAY. My Public Defender Dennis Maxwell immediately appealed the matter.

Also during that court appearance, Defendant WARREN and Defendant LINDSAY shared the order of the events from their perspectives while giving their testimonials on the witness stand.

The order of events on the day of October 1, 2021 according to Defendant WARREN and Defendant LINDSAY were as follows: Around 12:30 PM, Defendant WARREN arrived at Henderson County Sheriff's Office in response to Dan Pearson's truck being missing and saw an SUV parked in the parking lot.

Defendant LINDSAY was working at the "front desk," although I am unsure if that meant at the Sheriff's Office or at the Detention Facility.

Defendant WARREN and Dan Pearson had a discussion about Dan's missing truck while standing on the sidewalk outside of the Sheriff's Office.

Once Defendant WARREN and Dan had finished their conversation and Dan had left the premises, Defendant WARREN discovered the "12 SUX" signage on the pink vehicle.

He immediately went to review the camera footage and linked the person who signed "12 SUX" to the owner of the SUV, then ran the tag of the SUV to see that the owner was Mackenzie Brown (myself).

Then they "tried to apply for criminal process." They were "able to take out a warrant on Mackenzie Brown for INJURY TO PERSONAL PROPERTY."

Then they took pictures of the "12 SUX" signage.

Then they "attempted to remove it and were unable to." They "had to use a piece of vinyl covering to conceal the spot on the car."

It was acknowledged by both defendants while answering the cross-examination questions from my public defender, Dennis Maxwell, that HCSO was allowing the entire public community to add signage onto the pink vehicle for their event that day.

It was also acknowledged by both defendants that there were no rules or regulations or instructions or directions posted in any way as to what the public could, could not, should, or should not write.

In April of 2022, I went to Henderson County Magistrate's Office to inquire if the warrant for assault had been served yet on Dillion.

I was told by the Magistrate on duty, Monica Jernigan, that the criminal complaint form I had originally tried to file against Dillion was never filed. In fact, she told me she couldn't find any record of the form whatsoever, as if it had somehow disappeared.

I pulled the picture up on my phone I had taken of the form when I had originally filed it with Defendant OATES and I showed the picture to Magistrate Jernigan.

She told me she didn't understand why she couldn't find any record whatsoever of the form itself or the assault charge filed against Dillion.

I showed Magistrate Jernigan the picture of me standing in front of the pink vehicle that Defendant WARREN and Defendant LANDERS had taken while they were arresting me. I told her, "I had come here (to the Magistrates Office) and filled out the criminal complaint form right before this (the incident involving me being arrested for the "12 SUX" signage) happened."

Magistrate Jernigan and I reached the conclusion that Defendant OATES intentionally did not issue the assault by strangulation and/or domestic violence assault charges against Dillion I had tried to file on the day of October 1, 2021 and that I would have to speak to her herself to figure out why.

She wrote Defendant OATES' name down for me on a piece of paper and told me which day Defendant OATES would be working next, and that I should come back on that day and see if I could figure out where that form went.

On May 26, 2022, I went to Henderson County Magistrate's Office to speak to Defendant OATES, as Magistrate Jernigan recommended. I inquired about where the assault case against Dillion stood.

My words to her were, "You were the Magistrate who was working the day I came here to take out assault charges against Dillion Branch, back in October, for violently attacking me and strangling me while I was 16 weeks pregnant with his baby. I searched his name recently on the NC Courts website to see if maybe he had a court date for the assault case yet, since it's been almost 8 months now, but no such court date came up. Yet, he has a new court date for SPEEDING. Which brings me to my question for you... If Dillion was pulled over for speeding, that typically means his name would have been run. When his name was run, the officer should have seen the warrant for assault and served him, plus most likely arrested him too. Do you know why Dillion wasn't served or arrested at that time?"

Defendant OATES did not give me a direct answer. She began to seem very panicked, uncomfortable, dismissive, and evasive as the recognition set in of the particular day I was referring to.

I asked Defendant OATES if she could show me a copy of the criminal complaint form of the alleged assault, and just as it had with Magistrate Jernigan, no record of it could be found when it was searched for. However this time, the Magistrate searching for it was the same Magistrate who mysteriously lost the form to begin with.

Defendant OATES told me to come back when the next Magistrate was working once her shift ended and that I could speak to them, and then she told me that I needed to leave.

Although her tone was very high-pitched and hostile during the entire interaction, I spoke in a calm and polite tone the entire time, with genuine concern for the whereabouts of the form that had disappeared under her supervision.

On September 3, 2022 I went to Henderson County Magistrate's Office and filled out another criminal complaint form regarding the assault by Dillion with the Magistrate on duty, Monica Jernigan.

I filled the same exact information I had written on the original form onto the new form, other than under the "WHAT DID SUSPECT DO?" section, because Magistrate Jernigan filled in that part herself. She wrote, "Picked her up by the throat, pushed her up at throat, hands at neck and squeezed."

On September 19, 2022 during a court appearance on the matter, the prosecution party used intimidation tactics to attempt to coerce me into accepting a deal that would have implied me being guilty in the matter, when in reality the only laws broken were against me, not by me.

My Public Defender, Dennis Maxwell, and I had multiple conversations in the courthouse hallway throughout the day of the court appearance on the matter.

During our first conversation, Dennis Maxwell said to me, "They are offering you a deal where they'll dismiss the charge if you write an apology letter to the county and do some volunteer hours." My response: "Absolutely not. If anyone here needs an apology letter written to them, it is me."

In our second conversation, Dennis Maxwell said to me, "There's a new proposition where you wouldn't have to do any volunteer hours but you would still have to write the apology letter to the county." My response: "Absolutely not." Then I asked him who he was referring to by 'they' and he said the D.A. (Anthony Cavalieri).

Dennis Maxwell then told me that the prosecution party might try to use me being a couple minutes late against me, as if to add to their intimidation tactics in effort to convince me to accept their apology letter/volunteer hours deal. I still refused.

The case was continued. Dennis Maxwell told me that at that next court date, my case was going to be heard in front of a trial jury. A trial date was set for November 7, 2022.

On October 2, 2022, I went to Henderson County Magistrate's Office to inquire about the status of the assault case against Dillion. I was told that a warrant for ASSAULT ON A FEMALE had been served on him. Although this was not the charge that fit the severity of the crime itself, I told myself that it was better than nothing.

On October 26, 2022, Dillion was on the court docket in Henderson County for the ASSAULT ON A FEMALE case. This was his 1st appearance on the matter. The case was continued to a later date.

Later in the day on October 26, 2022, I got a phone call from my Public Defender, Dennis Maxwell. He told me the INJURY TO PERSONAL PROPERTY charge had been dismissed.

I learned later on while requesting a Proof of Dismissal form from Henderson County Clerk of Court that the reason for dismissal in the INJURY TO PERSONAL PROPERTY case was: NISITP - Not In The States Interest To Prosecute. The charge failed to set forth a crime under state law.

On July 10, 2023, I left Defendant DUNCAN, who is the Public Information Officer with the Henderson County Sheriff's Office, a voicemail at 828-697-4596 ext. 4305 asking him to give me a call back at the phone number I provided. In the voicemail I said, "I need verification that you were



the officer who made a particular Facebook post on Henderson County Sheriff's Office Facebook page on October 1st, 2021." I never did receive a call back from him.

On August 2, 2023, the ASSAULT ON A FEMALE case was disposed of because Dillion was deemed deceased.

## **First Claim**

### **42 U.S.C. Section 1983 – Against All Defendants**

Defendants at all times relevant to this action were acting under color of state law.

Defendant Henderson County Sheriff's Office acted in concert with the other defendants in the wrongdoing against Plaintiff.

Defendants WARREN, LINDSAY, LANDERS, DUNCAN, REESE, MAYBIN, OATES, and COWAN used viewpoint-based discrimination against Plaintiff to retaliate against her as a direct result of her expression that was protected by the First Amendment. The actions of these defendants violated Plaintiff's rights under the First Amendment to the United States Constitution, and caused Plaintiff personal humiliation, pain and suffering, mental anguish, and emotional distress.

Defendants WARREN, LINDSAY, LANDERS, and OATES conspired together to make an unreasonable seizure by way of arrest of the Plaintiff without probable cause. By doing that, they used unequal application of the law against Plaintiff by omitting her from the same treatment as everybody else, in violation of the Fourth Amendment to the Constitution of the United States as incorporated and applied to the states by way of the Fourteenth Amendment to the Constitution of the United States.

Defendants WARREN, LINDSAY, LANDERS, DUNCAN, REESE, MAYBIN, OATES, and COWAN engaged in a pattern of harassing or intimidating conduct towards Plaintiff, who was an innocent person, in violation of the Fourth Amendment to the Constitution of the United States as incorporated and applied to the states by way of the Fourteenth Amendment to the Constitution of the United States.

Defendant DUNCAN unlawfully invaded Plaintiff's privacy rights by publicizing her in a false light in violation of the First Amendment to the Constitution of the United States.

Defendant REESE harassed Plaintiff by giving her an unnecessarily heavy punishment for something that would not have been punished the same way under ordinary circumstances. His actions violated Plaintiff's rights under the Fourteenth Amendment to the Constitution of the United States.

Defendant MAYBIN used intimidation tactics to coerce surety companies to refuse to assist Plaintiff in her process of effecting her release from Henderson County Detention Facility, doing so without due process of law in violation of the Fourteenth Amendment to the Constitution of the United States.

Defendant OATES unlawfully failed to follow victims rights guidelines for Plaintiff without due process of law in violation of the Fourteenth Amendment to the Constitution of the United States.

Defendant COWAN unlawfully denied Plaintiff of her request for dismissal without due process of law in violation of the Fourteenth Amendment to the Constitution of the United States.

## Second Claim

### Violation of Victims Rights – Against Defendant OATES

Defendant OATES acted with negligence with omissions by lack of diligence in pursuing the viable domestic violence assault investigation that I was a victim in, preventing my safety, therefore failing to perform the duties of the Magistrate's Office, which includes to provide to every person who is legally interested in a proceeding, the full right to be heard according to law. Defendant OATES' actions violated Plaintiff Brown's Victim's Rights under North Carolina General Statutes § 15A-830.5, and caused Plaintiff Brown pain and suffering, mental anguish, emotional distress, and lack of safety and security.

Or violated my rights under the Crime Victims' Rights Act (CVRA) 18 U.S.C. Section 3771, whichever applies more.

**IV. Injuries**

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

(see attached)

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**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

(see attached)

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*[Continuation of Page 5 of COMPLAINT FOR VIOLATION OF CIVIL RIGHTS form - under INJURIES]*

I never wanted to or thought I would end up sitting in an extremely dirty jail cell in the midst of COVID without vaccination while I was pregnant. From the moment I was handcuffed until I walked out of the detention facility doors after bonding out, I was never once offered a face mask, hand sanitizer, or shown any sort of consideration for my concerns for cleanliness during COVID seeing that I was pregnant and unvaccinated. The stress caused unto me was not just mine to feel at the time, the baby I was 17 weeks pregnant with at the time of the incident had to feel all that negativity too.

#### SOCIAL HUMILIATION

I have suffered through improper assertions of guilt by being portrayed on HCSO's Facebook page in an inaccurate and humiliating false light. Once 20 different news outlets broadcasted HCSO's post, totaling 21 sources that linked to the incident, it triggered an extremely harsh, unnecessary, and overwhelming reaction from society. There were thousands of derogatory insults about me in the comments section of the Facebook post. This led to biased judgment about me by the public, causing harm to my reputation.

After I bonded out of jail the night of the arrest and checked my phone, there was an insult waiting for me in my Facebook Messenger account from a random stranger that said "You'll never get as much time as you deserve you worthless piece of shit," so I went ahead and deleted my Facebook and Facebook Messenger account before it had a chance to get any worse.

#### RELATIONSHIPS

This whole scenario has hampered my social relationships, because of social anxiety or social phobias. My forms of that are usually withdrawing myself into my home where I'm in isolation from fear of going out into the public and facing society. I have a heightened sense of danger and fear of being done wrong. I have struggled to maintain healthy relationships because of my self-deprecating emotions. For example, I've transformed into someone who expects the absolute worst from humanity. Also I have extreme sensitivity to criticism, often taking offense even when none is probably meant. Other times I've accidentally subjected myself to unhealthy relationship attachments from the vulnerability I have felt.

#### SELF

Particularly from the harsh reaction from society as well as the insults of Defendants WARREN, LANDERS, and MAYBIN during the false arrest, I have developed negative ideas about myself that are extremely difficult to dismantle.

I often have broken self-esteem, feelings of inadequacy, and distorted ideas of my worth, value, or capabilities where I didn't really feel these things prior to the incidents. I have lost self-love and confidence and become much more overly self-conscious and self-critical.

I have felt helpless, misunderstood, targeted, humiliated, embarrassed, degraded, and alone.

#### WORKPLACE

I've had to make workplace adjustments because of my persistent worries and nervousness from overthinking and overanalyzing. This has manifested in an decreased ability to carry out responsibilities, usually from fear of making mistakes. I've developed unrealistic expectations for myself.

#### FEAR

I have developed a fear of the capabilities of the law enforcement officers and judicial officials in Henderson County, which normally manifests in the form of avoidance of venturing into the public from fear and paranoia of being pulled over and harassed for no reason other than I am recognized.

The way that it feels to think of the Henderson County Sheriff's Office and attach cruelty, injustice, and corruption as mental ties to them, is like a heavy burden that weighs on me, rather than a secure blanket of protection and safety that the idea of law enforcement is supposed to provide.

Below I've listed some of the reasons why this entire experience overall has had a chilling effect on me, causing me to develop an inhibition of the exercise of natural and legal rights from fear of legal repercussions or retaliation:

- To be arrested by officers and officials that had malicious intent behind arresting me without probable cause and with improper motive for something I was not breaking any law by doing
- Being too frightened of retaliation to attempt to ask for a supervisor at any point throughout the totality of the events
- Having intimidation tactics used against me at one of the court appearances to try and convince me into accepting a dismissal that would imply guilt on my part
- I got pulled over on April 29, 2023 for no apparent reason. The officer, who seemed to have recognized my car, made a U-turn to follow me for 4.1 miles through back roads all the way from right in front of East Henderson High School to in front of the Shell Station on Dana Road. When I got blue-lighted and he walked up to my window, he said "You couldn't give me a reason to pull you over till right at the very end." I remember feeling a lot of fear that he was intentionally trying to find some way to arrest or harass me.

•There has been an extreme fear of Animal Enforcement putting my dog down from the unnecessary harassment-based violation fee of \$550 that not only I couldn't afford to pay, but I shouldn't have had to pay. The violation fee from Animal Enforcement would not have been issued to me without the incident of the pink car false arrest happening. It is no coincidence that Defendant REESE showed up the morning after the false arrest with such an unnecessarily harsh punishment for something that would not have been punished the same way under ordinary circumstances. When a dog is "deemed dangerous" in Henderson County, as mine was several years ago, Animal Enforcement considers it a dog's "strike 1." Since I could not afford to pay the harassment-based \$550 violation fee that Defendant REESE issued me, and the Animal Enforcement officer on the phone told me that instead of paying it they would just mark it as my dog's "strike 2" but that they would put her down on "strike 3," the fear I now have to live with of my dog being murdered, where I didn't have that fear before, has impacted me greatly.

•The domestic violence victims rights violation by Defendant OATES has sickened me as a human being. It scares me that the same person with the authority to procedurally order the protection of a victim and is required by law to abide by victim rights guidelines, is the very person that deprived me of that protection as a victim. This is a case that would have / should have been classified as one of the following or similar to the following: DOMESTIC ASSAULT AND BATTERY BY STRANGULATION or DOMESTIC ASSAULT AND BATTERY AGAINST A PREGNANT WOMAN. Even if you take away the factor that she unlawfully issued a warrant for INJURY TO PERSONAL PROPERTY against me, and no matter how opinionated or biased her interpretation of my "12 SUX" signage might have been, Defendant OATES reasonably, morally, and lawfully, should have still issued the assault warrant against Dillion. The fact that that type of Magistrate exists in our judicial system, that would intentionally make such an immoral, unethical, and unprincipled set of choices... it worries and scares me as a citizen of this county and state.

*[Continuation of Page 5 of COMPLAINT FOR VIOLATION OF CIVIL RIGHTS form - under RELIEF]*

**RELIEF:**

Upon making a determination that a defendant has indeed violated the rights of the Plaintiff, request for action to be taken to correct the defendant's wrongdoing, including but not limited to, a combination of the below-stated actions to be pursued as penalties.

Permanent Injunction to effectuate compliance where necessary, by the court instituting an injunction to correct violations and to ensure non-reoccurrence of further violations.

Compensatory damages to compensate Plaintiff for the injury or loss caused by defendants' unlawful conduct, including but not limited to the economic damages of out-of-pocket expenses, as well as the non-economic damages of personal humiliation, pain and suffering, mental anguish, and emotional distress.

Punitive damages to go beyond what compensatory damages are deemed insufficient for, with intention to punish the defendants.

Official Reprimandence, Demotion, or Suspension of law enforcement officers or judicial officials where deemed necessary.

Suppression and deletion of any evidence or documentation that was obtained from the false arrest or related to the incident. This would include not only legal paperwork, but also any online publication, article, or post involving the false portrayal of the incident linked in any way whatsoever to my name or face. I request that HCSO reach out to each of the 21 sources that I've listed on the following page, and not only request that the posts be removed, but ensure it.

A jury trial on all appropriate issues.

Any and all other relief and remedies that this Court deems just and proper.



**NAME OF SOURCE:**

1. Daily Advent: Opera News
2. Facebook: Fox Eastern Carolina page
3. Facebook: Henderson County Sheriff's Office page
4. Facebook: WLOS ABC 13 page
5. Fox San Antonio
6. Henderson County Sheriff's Office App
7. Mountain Area Information Network
8. MSN
9. My40
10. NC Criminal Law A UNC School of Government Blog
11. News 4 San Antonio
12. News Beezer
13. News Break
14. Spotonorthcarolina
15. Twitter: WSAV News 3 page
16. WCTI12: ABC 12 News
17. WJBF
18. WLOS: News 13
19. WRBL: News 3
20. WSAV-TV
21. WSPA: News 7

**LINKS:****1. Daily Advent: Opera News**

<https://www.dailyadvent.com/news/amp/6a69e1d2cef9cd032f6a9e0c967a638f-Henderson-County-Sheriffs-Office-tribute-patrol-car-vandalized>

**2. Facebook: Fox Eastern Carolina**

[https://m.facebook.com/story.php?story\\_fbid=pfbid02SSYAc6hC2DqX8rsHbMRLy3Nje9qkPFbX3wyXnMGKsmypy1EjHDbmAdLfDRkAAbvml&id=1569995973016444](https://m.facebook.com/story.php?story_fbid=pfbid02SSYAc6hC2DqX8rsHbMRLy3Nje9qkPFbX3wyXnMGKsmypy1EjHDbmAdLfDRkAAbvml&id=1569995973016444)

**3. Facebook: Henderson County Sheriff's Office page**

[https://m.facebook.com/story.php?story\\_fbid=226687436157771&id=100064495491934](https://m.facebook.com/story.php?story_fbid=226687436157771&id=100064495491934)

**4. Facebook: WLOS ABC 13 page**

[https://m.facebook.com/News13/posts/a-flat-rock-woman-has-been-charged-with-vandalizing-a-henderson-county-sheriffs-/10158779821811799/?locale=ne\\_NP&rdr](https://m.facebook.com/News13/posts/a-flat-rock-woman-has-been-charged-with-vandalizing-a-henderson-county-sheriffs-/10158779821811799/?locale=ne_NP&rdr)

**5. Fox San Antonio**

<https://foxsanantonio.com/amp/news/nation-world/tribute-patrol-car-vandalized>

**6. Henderson County Sheriff's Office App**

<https://apps.myocv.com/share/a39828792>

**7. Mountain Area Information Network**

<http://main.nc.us/cnnews/archives/202110.shtml>

**8. MSN**

<https://www.msn.com/en-us/news/crime/henderson-county-sheriffs-office-tribute-patrol-car-vandalized/ar-AAP4I24>

**9. My40**

<https://my40.tv/tribute-patrol-car-vandalized>

**10. NC Criminal Law A UNC School of Government Blog**

<https://nccriminallaw.sog.unc.edu/news-roundup-586/>

**11. News 4 San Antonio**

<https://news4sanantonio.com/news/nation-world/tribute-patrol-car-vandalized>

**12. News Beezer**

<https://newsbeezer.com/woman-arrested-after-destroying-the-new-pink-henderson-co-sheriffs-office-police-car/>

**13. News Break**

<https://www.newsbreak.com/news/2390362352717/woman-arrested-after-vandalizing-henderson-co-sheriff-s-office-new-pink-patrol-car>

**14. Spotonorthcarolina**

<https://spotonnorthcarolina.com/mountains/1808025/henderson-county-sheriffs-office-tribute.html>

**15. Twitter: WSAV News 3 page**

<https://mobile.twitter.com/WSAV/status/1445105845721837571>

**16. WCTI12: ABC 12 News**

<https://wcti12.com/news/state-news/henderson-county-sheriffs-office-tribute-patrol-car-vandalized>

**17. WJBF**

<https://www.google.com/amp/s/www.wjbf.com/news/woman-arrested-after-vandalizing-henderson-co-sheriffs-office-new-pink-patrol-car/amp/>

**18. WLOS: News 13**

<https://wlos.com/news/local/tribute-patrol-car-vandalized>

**19. WRBL: News 3**

<https://www.wrbl.com/news/national/woman-arrested-after-vandalizing-henderson-co-sheriffs-office-new-pink-patrol-car/amp/>

**20. WSAV-TV**

[https://www.wsav.com/crime-safety/woman-arrested-after-vandalizing-new-pink-patrol-car/?utm\\_campaign=socialflow&utm\\_medium=referral&utm\\_source=t.co](https://www.wsav.com/crime-safety/woman-arrested-after-vandalizing-new-pink-patrol-car/?utm_campaign=socialflow&utm_medium=referral&utm_source=t.co)

**21. WSPA: News 7**

<https://www.wspa.com/news/local-news/woman-arrested-after-vandalizing-henderson-co-sheriffs-office-new-pink-patrol-car/amp/>

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 9-14-2023

Signature of Plaintiff

Mackenzie Elaine Brown

Printed Name of Plaintiff

Mackenzie Elaine Brown

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

\_\_\_\_\_  
*City*

\_\_\_\_\_  
*State*

\_\_\_\_\_  
*Zip Code*

Telephone Number

E-mail Address